

# EXHIBIT B

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

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IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case 3:23-md-03084-CRB

MDL No. 3084

Honorable Charles R. Breyer

**WILLIAMS HART & BOUNDAS  
PLAINTIFFS' RULE 26(g)  
CERTIFICATION PURSUANT TO THE  
COURT'S ORDER DATED NOVEMBER  
19, 2025 [DOC. 4442]**

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This Document Relates to:  
*WHB 1478 v. Uber Technologies, Inc., et al., No. 3:24-cv-04833*  
*WHB 1123 v. Uber Technologies, Inc., et al., No. 3:24-cv-04850*  
*WHB 1144 v. Uber Technologies, Inc., et al., No. 3:24-cv-04859*

Date: December 12, 2025  
Time: 10:00 am  
Courtroom: 6 – 17th Floor

1                   *WHB 196 v. Uber Technologies, Inc., et al.,*  
2                   No. 3:24-cv-04886

3                   *WHB 526 v. Uber Technologies, Inc., et al.,*  
4                   No. 3:24-cv-04901

5                   *WHB 950 v. Uber Technologies, Inc., et al.,*  
6                   No. 3:24-cv-04931

7                   *WHB 1936 v. Uber Technologies, Inc., et*  
8                   *al., No. 3:24-cv-04950*

9                   *WHB 1387 v. Uber Technologies, Inc., et*  
10                   *al., No. 3:24-cv-04958*

11                   *WHB 175 v. Uber Technologies, Inc., et al.,*  
12                   No. 3:24-cv-04982

13                   *WHB 1916 v. Uber Technologies, Inc., et*  
14                   *al., No. 3:24-cv-05003*

15                   *WHB 1845 v. Uber Technologies, Inc., et*  
16                   *al., No. 3:24-cv-05015*

17                   *WHB 1891 v. Uber Technologies, Inc., et*  
18                   *al., No. 3:24-cv-05037*

19                   *WHB 979 v. Uber Technologies, Inc., et al.,*  
20                   No. 3:24-cv-05082

21                   *WHB 649 v. Uber Technologies, Inc., et al.,*  
22                   No. 3:24-cv-05095

23                   *WHB 1425 v. Uber Technologies, Inc., et*  
24                   *al., No. 3:24-cv-05129*

25                   *WHB 427 v. Uber Technologies, Inc., et al.,*  
26                   No. 3:24-cv-05132

27                   *WHB 1382 v. Uber Technologies, Inc., et*  
28                   *al., No. 3:24-cv-05232*

*WHB 428 v. Uber Technologies, Inc., et al.,*  
                         No. 3:24-cv-05236

*WHB 1962 v. Uber Technologies, Inc., et al.,*  
                         No. 3:24-cv-05240

*WHB 1549 v. Uber Technologies, Inc., et al.,*  
                         No. 3:24-cv-05275

*WHB 1048 v. Uber Technologies, Inc., et al.,*  
                         No. 3:24-cv-05462

1                   *WHB 1443 v. Uber Technologies, Inc., et*  
 2                   *al., No. 3:24-cv-05472*

3                   *WHB 1596 v. Uber Technologies, Inc., et*  
 4                   *al., No. 3:24-cv-05473*

5                   *WHB 1673 v. Uber Technologies, Inc., et*  
 6                   *al., No. 3:24-cv-05552*

7                   *WHB 519 v. Uber Technologies, Inc., et al.,*  
 8                   *No. 3:24-cv-05627*

9                   *WHB 393 v. Uber Technologies, Inc., et al.,*  
 10                  *No. 3:24-cv-05633*

11                  *WHB 1416 v. Uber Technologies, Inc., et*  
 12                  *al., No. 3:24-cv-05667*

13                  *WHB 2052 v. Uber Technologies, Inc., et*  
 14                  *al., No. 3:25-cv-01129*

15                  *WHB 2045 v. Uber Technologies, Inc., et*  
 16                  *al., No. 3:25-cv-01211*

17                  Counsel for the Plaintiffs listed below, pursuant to the Court’s Order Regarding  
 18                  Defendants’ Amended Motion to Dismiss for Failure to Comply with PTO 10, dated November  
 19                  19, 2025 (Doc. 4442) (the “Court’s Order”), serve the following Rule 26(g) certification.

20                  As a preliminary matter, Plaintiffs state that four of the Plaintiffs listed on Exhibit A to the  
 21                  Court’s Order have reviewed and uploaded signed verifications to their most recently amended  
 22                  PFS. Therefore, the following four Plaintiffs intend to seek relief requesting that their cases not be  
 23                  dismissed, and further requesting that they be relieved from the requirement to file notices of  
 24                  dismissal:

25                  (1) Plaintiff WHB 1891, ID 1744, uploaded a signed verification to MDL Centrality on  
 26                  November 24, 2025;

27                  (2) Plaintiff WHB 2056, ID 2903, uploaded a signed verification to MDL Centrality on  
 28                  November 14, 2025;

29                  (3) Plaintiff WHB 428, ID 1917, uploaded a signed verification to MDL Centrality on  
 30                  November 24, 2025; and

1 (4) Plaintiff WHB 1387, ID 1635, uploaded a signed verification to MDL Centrality on  
 2 November 24, 2025.

3 Further, the following Plaintiffs' cases listed on Exhibit A had been dismissed prior to  
 4 entry of the Court's Order: Plaintiffs WHB 305 (ID 1581); WHB 1860 (ID 2061); WHB 1317 (ID  
 5 2199); WHB 678 (ID 2078); and WHB 2055 (ID 2902).

6 The two Plaintiffs listed below appear on Exhibit A to the Court's Order. These Plaintiffs  
 7 reviewed their most recently amended PFS before it was served via MDL Centrality:

8	9	MDL ID	JANE DOE IDENTIFIER	CAUSE NUMBER	AMENDMENT MADE
10	11	1. 1885	WHB 1549	24-CV-05275	III.9 – date of incident  V.30.a. contact information
12	13	2. 1969	WHB 1596	24-CV-05473	II.7 – employer information for two years prior to incident  VI.40.a. – name of HCP at STESA, name of HCP at Santa Barbara County Public Health Dept., identify non-treating HCP noted in Q. 39  VII.2 – select an option for form of discovery

20 The remaining Plaintiffs listed below appear on Exhibit A to the Court's Order . These  
 21 Plaintiffs did not review their most recently amended PFS before it was served via MDL  
 22 Centrality.

23 Pursuant to Rule 26(g), I am one of the attorneys of record for these Plaintiffs. I certify  
 24 that to the best of my knowledge, information, and belief formed after a reasonable inquiry, the  
 25 information provided in each of these Plaintiffs' most recently amended PFS was complete and  
 26 correct at the time it was made prior to service via MDL Centrality. The Plaintiffs are listed  
 27  
 28

1 below, along with a statement of the amendment or amendments that were made to each  
 2 respective amended PFS.<sup>1</sup>

4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28
MDL ID	JANE DOE IDENTIFIER	CAUSE NUMBER	AMENDMENT MADE																					
1.	1546	WHB 1478	24-CV-04833	II.2. middle name * Plaintiff has verified two prior Fact Sheets																				
2.	1659	WHB 1123	24-CV-04850	II.2 middle name  III.14.a. Drop-off address, city, state  III.14.b. Response to 14(b) as to whether you and the driver communicated about ending the trip at a location other than the requested destination  (Plaintiff wrote in her incident details that driver took her to her intended destination, her home. The response “yes” in question 14 is incorrect.)  *Plaintiff verified prior Fact Sheet on January 24, 2025																				
3.	1567	WHB 1144	24-CV-04859	Uber’s alleged deficiency was inconsistent responses to questions 3 and 10 and 25 and 33.  VII.2 - Did not check off form of disclosure on authorization (electronic or hard copy). The authorization is moot since Plaintiff is obliged to obtain records under Amended PTO 10. Regardless, it was Uber’s choice as to how it																				

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<sup>1</sup> Plaintiffs submit that under Amended PTO 10 (which was issued on November 3, after Uber filed its motions to dismiss these cases) and Judge Cisneros’s November 18, 2024 order, the PFS’s previously submitted and verified by most if not all of these Plaintiffs on both lists did not warrant the “deficiencies” that Uber claimed (for example, missing middle name or contact information for certain individuals, or claimed “inconsistent” responses), and were materially and substantially complete. Therefore, certain of these Plaintiffs, as permitted under Amended PTO 10, will be filing a motion to vacate the dismissal.

				received records via authorization, not Plaintiff's.  *Plaintiff verified prior Fact Sheet and signed mental health authorization in November 2024
4.	1573	WHB 196	24-CV-04886	II.7 – employment information  V.30.a. – last known contact information for Plaintiff's sister. Plaintiff's answer that she does not have this information is an acceptable answer under PTO 10 and the November 18, 2024 Order Resolving Dispute Regarding Obligations Under Pretrial Order No. 10 (Doc. 1877)  *Plaintiff verified two prior Fact Sheets
5.	1614	WHB 526	24-CV-04901	II.7 – employment information from 3/2019 – 5/2023  V.30.a – provide full name and contact information. (Plaintiff provided phone number.)  VII.3 – failed to attach records; law enforcement authorization. The authorization is moot since Plaintiff is obliged to obtain records under Amended PTO 10.  *Plaintiff verified prior Fact Sheet in January 2025
6.	1681	WHB 950	24-CV-04931	V.30.1 –contact information. Plaintiff's answer that she does not have this information for Mohammed K. is an acceptable answer under PTO 10 and the November 18, 2024 Order Resolving Dispute Regarding Obligations Under Pretrial Order No. 10 (Doc. 1877). She provided the contact information that she does have for witness Edward R.

1	2	3	4	Uber's alleged deficiency was inconsistent responses to questions 35 and 40(a) (Pre-existing conditions)
5	6	7	8	VI.40(a) – full name of HCP, dates 9 of treatment, diagnoses. Plaintiff's 10 answer that she does not know the 11 name of the HCP at Arlington 12 Heights Clarity Clinic is an 13 acceptable answer under PTO 10 14 and the November 18, 2024 Order Resolving Dispute Regarding Obligations Under Pretrial Order No. 10 (Doc. 1877). The same is true of her answer that she does not remember the approximate dates of diagnosis, treatment, or examination.
15	16	17	18	*Plaintiff verified two prior Fact 19 Sheets
20	21	22	23	7. 1653 WHB 1936 24-CV-04950 II.2 – middle name V.30.a. – contact information Plaintiff's answer that she does not know the contact information for the witness is an acceptable answer under PTO 10 and the November 18, 2024 Order Resolving Dispute Regarding Obligations Under Pretrial Order No. 10 (Doc. 1877). *Plaintiff verified prior Fact Sheet in October 2024
24	25	26	27	9. 1697 WHB 175 24-CV-04982 II.7 – employment information. V.30.a. – contact information. *Plaintiff verified prior Fact Sheet in September 2024
28				10. 1702 WHB 1916 24-CV-05003 V.30.a – contact information Plaintiff provided all contact information for the witnesses that she knows per PTO 10 and the November 18, 2024 Order

1	2	3	4	5
				Resolving Dispute Regarding Obligations Under Pretrial Order No. 10 (Doc. 1877).  *Plaintiff verified two prior Fact Sheets
6	7	8	9	10
11	12. 1725	13. WHB 1845	14. 24-CV-05015	15. V.30.a – contact information
16	17	18	19	20
21	22	23	24	25
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				11. 1770 WHB 979 24-CV-05082 III.13.a. & 14.a. – address of apartment complex identified in narrative response to Q.20. Plaintiff stated in her narrative response that the apartment complex was a random complex she had never been to and she did not know the address.  V.30.a – contact information Plaintiff's answer that she does not have the contact information for the witnesses is an acceptable answer under PTO 10 and the November 18, 2024 Order Resolving Dispute Regarding Obligations Under Pretrial Order No. 10 (Doc. 1877).  Plaintiff verified prior Fact Sheet in January 2025
				12. 1712 WHB 649 24-CV-05095 Uber's alleged deficiency was inconsistent responses to questions 24 and 20.  V.30.a. – contact information Plaintiff's answer that she does not recall the contact information for Karen S is an acceptable answer under PTO 10 and the November 18, 2024 Order Resolving Dispute Regarding Obligations Under Pretrial Order No. 10 (Doc. 1877). Plaintiff provided the contact information she knew for Mr. Stewart.  *Plaintiff verified two prior Fact Sheets
				13. 1868 WHB 1425 24-CV-05129 II.7. – employment information

				*Plaintiff verified prior Fact Sheet in December 2024
15.	1866	WHB 427	24-CV-05132	<p>Uber's alleged deficiency was inconsistent responses to questions 28, 30 and 20. –</p> <p>VI.40.a – provide complete HCP name and diagnosis information Plaintiff's answer that she does not know the name of the HCP at Methodist North Lake is an acceptable answer under PTO 10 and the November 18, 2024 Order Resolving Dispute Regarding Obligations Under Pretrial Order No. 10 (Doc. 1877). The same is true of her answer that she does not know the “diagnosis, treatment, or examination (if known).”</p> <p>VII.2 – did not write date of incident on authorizations. The authorization is moot since Plaintiff is obliged to obtain records under Amended PTO 10.</p>
16.	1916	WHB 1382	24-CV-05232	<p>Uber's alleged deficiency was inconsistent responses to question 25, 27, and 20.</p> <p>VII.3 – did not provide full SSN on authorization The authorization is moot since Plaintiff is obliged to obtain records under Amended PTO 10.</p> <p>*Plaintiff verified prior Fact Sheet and signed law enforcement authorization in October 2024</p>
17.	1918	WHB 1962	24-CV-05552	<p>II.3. – provide the period this name was used</p> <p>*Plaintiff verified prior Fact Sheet in December 2024</p>

1	18.	1943	WHB 1048	24-CV-05462	III.13.a – provide information about where the driver stopped during the trip  III.14.a. – provide a response  III.16. – provide time and location of incident  (Plaintiff answered that driver took her to a hotel she did not recognize.)
7	19.	1950	WHB 1443	24-CV-05472	V.30.a. – contact information Plaintiff's answer that she does not have any more information for the witness is an acceptable answer under PTO 10 and the November 18, 2024 Order Resolving Dispute Regarding Obligations Under Pretrial Order No. 10 (Doc. 1877).  *Plaintiff verified two prior Fact Sheets
14	20.	1962	WHB 1673	24-CV-05552	II.7. – employment information  VII.2 & VII.3 - Did not check off form of disclosure on authorization (electronic or hard copy) The authorization is moot since Plaintiff is obliged to obtain records under Amended PTO 10. Regardless, it was Uber's choice as to how it received records via authorization, not Plaintiff's.  *Plaintiff verified two prior Fact Sheets
23	21.	2147	WHB 519	24-CV-05627	II.2 – middle name  II.7 – employer from 11/2014 – 5/2015  *Plaintiff verified prior Fact Sheet in October 2024
27	22.	2150	WHB 393	24-CV-05633	II.2 – middle name

1				Uber's alleged deficiency was inconsistent responses to questions 20, 28, 30, 30(a)
2				*Plaintiff verified prior Fact Sheet in February 2025
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4	23.	2177	WHB 1416	24-CV-05667  Uber's alleged deficiency was inconsistent responses to questions 22 and 20  V.30.a – last name for daughter; contact information for other witness, Plaintiff's answer that she does not have contact information for Jacob A. is an acceptable answer under PTO 10 and the November 18, 2024 Order Resolving Dispute Regarding Obligations Under Pretrial Order No. 10 (Doc. 1877). Plaintiff provided contact information for her daughter.   VI.40.a. – name of HCP. Plaintiff provided the name of the facility. She does not recall the name of the ER doctor who treated her at the hospital. This is an acceptable answer under PTO 10 and the November 18, 2024 Order Resolving Dispute Regarding Obligations Under Pretrial Order No. 10 (Doc. 1877).  *Plaintiff verified two prior Fact Sheets
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22	24.	2898	WHB 2052	25-CV-01229  II.2 – middle name  *Plaintiff verified prior Fact Sheet in February 2025
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24	25.	2889	WHB 2045	25-CV-01211  II.7 – employer from 1/2015 – 1/2017  Uber's alleged deficiency was inconsistent responses to questions 11, 14, and 20
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1				III.19 – no response. Plaintiff did 2 not describe taking any videos or 3 audio recordings in her narrative 4 response to Q. 20.  5 *Plaintiff verified prior Fact Sheet 6 in March 2025
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7 Dated: November 5, 2025

8 /s/ Walt Cubberly

9 John Eddie Williams, Jr.

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11 Margret Lecocke

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26 *Attorneys for Plaintiff*

27 **CERTIFICATE OF SERVICE**

28 I hereby certify that on December 3, 2025, I electronically filed the following with the Clerk  
1 of the Court using the CM/ECF system, which will send notification of such filing via electronic  
2 mail to all counsel of record as maintained in the CM/ECF electronic system.

3 Dated: December 3, 2025

4 Respectfully Submitted,

5 /s/ Walt Cubberly

6 Walt Cubberly